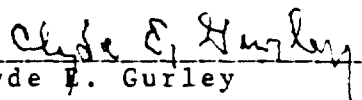


## SUPPLEMENT TO DECLARATION

Subject: Declaration, dated August  
20, 1991, filed with the  
Federal Communications  
Commission (FCC) on behalf  
of Northeast Florida  
Broadcasting, Corp.  
(Northeast Florida)

Associated with subject Declaration is a map that shows the locations of Ms. Lillian Holt's residences in relation to the projected signal strength contours of the facility that is proposed by Northeast Florida. Subsequent to the filing of these documents, I have been asked to determine distances from these residences to the projected 1.0 mV/m field intensity contour.

The map that was previously submitted with the original Declaration (Exhibit 5A1) shows that Ms. Holt's residences at 7235 Sharbeth Drive South and 3716 Bramble Road are within the projected 60 dBu (1.0 mV/m) signal contour. It also shows that the residences are approximately 0.40 km (0.25 miles) and 2.41 km (1.5 miles), respectively, from the 1.0 mV/m contour on a line from the proposed antenna site through the geometric center of the streets of residence. The entire street in both cases appears to be within the 1.0 mV/m contour. The distances from Exhibit 5A1 were verified by transferring the 1.0 mV/m contour from that exhibit in the region of interest to a 7.5 minute topographical map and redetermining distances. Determinations of distances from both maps are in reasonable agreement. However, Ms. Holt's residence at 2567 College Street is outside of the projected contour by approximately 3.78 km (2.35 miles) on a line from proposed antenna site through center of street of current residence.

  
Clyde E. Gurley

Dated: September 6, 1991

**EXHIBIT 5**

Integration Statement

Lillian Holt, 100% voting shareholder, President and Director of Northeast Florida Broadcasting Corp., will work full-time (minimum of 40 hours per week) as General Manager of the proposed station. As General Manager, Ms. Holt will have complete responsibility for all major decisions in the day-to-day management of the station. Ms. Holt will supervise all management employees of the station and have final authority with respect to all hiring and firing decisions. Ms. Holt will resign from any then current employment to assume her duties as the General Manager not later than the grant of program test authority for the station.

Ms. Holt has resided within Jacksonville, Florida since February, 1985 and will claim service area local residence credit.

Ms. Holt is an African American and will claim minority enhancement credit.

Ms. Holt is a female and will claim female enhancement credit.

Ms. Holt will claim civic involvement credit for the following civic activities:

1986-1988	UNCF Duval County Telethon Campaign
1988	Mayor's Educational Council
1987	"We Care Festival" at Edward Waters College
1989	Arts Assembly of Jacksonville, Board of Directors, Member Arts and Education Committee and Cultural Diversity Committee.
1988-1989	Asland House, Volunteered proposal drafting help.
1988-1989	Help Center, volunteered proposal drafting help.
1989	Duval County School Board, Middle School Coordinating Committee
1989	Resource Development Task Force, Jacksonville.

- 1989        National Urban League Aids Advisory Committee  
for South Eastern Region; Aids Literature Review  
Committee
- 1989        Jacksonville Urban League, Minority Aids  
Coalition
- 1989        Jacksonville Chamber of Commerce, Community  
Affairs Department, Board of Directors
- 1989        Planning Committee, Florida Black on Black Crime  
Annual Conference

**EXHIBIT 6**

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In re Applications of	)	MY Docket No. 91-10
	)	
Charley Cecil & Dianna Mae White	)	
d/b/a WHITE BROADCASTING PARTNERSHIP	)	File No. BPH-891214MM
<u>et al.</u>	)	
	)	
NORTHEAST FLORIDA BROADCASTING CORP.	)	File No. BPH-891214NA
	)	
For Construction Permit to Build	)	
a New FM Station on Channel 289A	)	
in Baldwin, Florida	)	

To: Honorable Edward Luton  
Administrative Law Judge

PETITION FOR LEAVE TO AMEND

Northeast Florida Broadcasting Corp. ("Northeast"), by its counsel, hereby petitions for leave to amend the above-captioned application. In support thereof, Northeast states the following:

1. Northeast seeks to amend its application in order to specify the current residential address of its president, Lillian Holt. This amendment is being made pursuant to Section 1.65 of the Commission's Rules. 47 C.F.F. § 1.65

2. Good cause exists for the acceptance of this amendment. See Erwin O'Conner Broadcasting Co., 22 FCC 2d 140, 18 RR 2d 820, 824 (Rev. Bd. 1970). Furthermore, the amendment is timely filed and acceptance of the amendment will not delay or disrupt the proceeding, nor will any party be prejudiced by its acceptance, and Northeast will gain no comparative advantage by virtue of the amendment.

WHEREFORE, having shown good cause, Northeast Florida Broadcasting Corp. respectfully requests that the Commission grant this petition for leave to amend its application.

Respectfully Submitted,

NORTHEAST FLORIDA  
BROADCASTING CORP.

By: 

James L. Winston  
Desmond P. Brown  
RUBIN, WINSTON, DIERCKS & HARRIS  
1730 M Street, N.W.  
Suite 412  
Washington, D.C. 20036  
(202) 861-0870

Its Attorneys

Dated: May 7, 1991

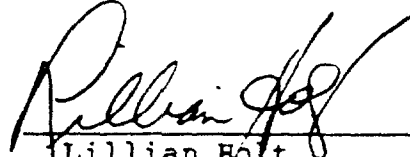
Northeast Florida  
Broadcasting Corp.  
Baldwin, Florida  
File No. BPH-891214NA

AMENDMENT

Northeast Florida Broadcasting Corp. respectfully requests that its application for a new FM broadcast station on Channel 289A at Baldwin, Florida, File No. BPH-891214NA, be amended to reflect the current address of its president, Lillian Holt, which is as follows:

Lillian Holt  
2567 College Street  
Jacksonville, Florida 32204

NORTHEAST FLORIDA  
BROADCASTING CORP.

  
\_\_\_\_\_  
Lillian Holt  
President

Dated: March 31, 1991



CERTIFICATE OF SERVICE

I, Kathy Nickens, a secretary in the law firm of Rubin, Winston, Diercks & Harris, hereby certify that a copy of the attached PETITION FOR LEAVE TO AMEND AND AMENDMENT was served this 7th day of May 1991, to the following persons by first class mail, postage prepaid:

Honorable Edward Luton  
Administrative Law Judge  
Federal Communications  
Commission  
2000 L Street, N.W.  
Room 225  
Washington, D.C. 20554

Mr. Charles E. Dziedzic  
Chief, Hearing Branch  
Federal Communications  
Commission  
Mass Media Bureau  
2025 M Street, N.W.,  
Room 7212  
Washington, D.C. 20554

Chief, Data Management Staff  
Federal Communications  
Commission  
Mass Media Bureau  
Audio Services Division  
1919 M Street, N.W.,  
Room 350  
Washington, D.C. 20554

Denise B. Moline, Esq.  
McCabe & Allen  
9105 Owens Drive  
P.O. Box 2126  
Manassas Park, Virginia 22111  
Counsel for White Broadcasting  
Partnership

David Honig, Esq.  
1800 N.W. 187th Street  
Miami, Florida 33056  
Counsel for Peaches  
Broadcasting, Ltd.

Allan G. Moskowitz, Esq.  
Kaye, Scholer, Fierman,  
Hays & Handler  
901 15th Street, N.W.  
Suite 1100  
Washington, D.C. 20005  
Counsel for Sage Broadcasting  
Corporation

Dennis J. Kelly, Esq.  
Cordon and Kelly  
Second Floor  
1920 N Street, N.W.  
Washington, D.C. 20036  
Counsel for First Coast  
Broadcasting Company

Arthur V. Belendiuk, Esq.  
Smithwick & Belendiuk, P.C.  
2033 M Street, N.W.  
Suite 207  
Washington, D.C. 20036  
Counsel for Douglas Johnson

Salvador A. Serrano  
7205 Enterprise Avenue  
McLean, Virginia 22101  
Counsel for JEM Productions,  
Limited Partnership

Federal Aviation Administration  
Office of Chief Counsel  
AGC-230  
800 Independence Avenue, S.W.  
Washington, D.C. 20591

  
Kathy Nickens

**EXHIBIT 7**

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In re Applications of	)	MM Docket No. 91-10
	)	
Charley Cecil & Dianna Mae White	)	
d/b/a WHITE BROADCASTING PARTNERSHIP	)	File No. BPH-891213MM
<u>et al.</u>	)	
	)	
NORTHEAST FLORIDA BROADCASTING CORP.	)	File No. BPH-891214NA
	)	
For Construction Permit to Build	)	
a New FM Station on Channel 289A	)	
in Baldwin, Florida	)	

To: The Honorable Edward Luton  
Administrative Law Judge

INTEGRATION AND DIVERSIFICATION STATEMENT

1. Northeast Florida Broadcasting Corp. ("Northeast Florida"), by its counsel, and in response to the Order of the Presiding Officer, FCC 91M-1455, released April 26, 1991, hereby submits its Integration and Diversification Statement.

2. Northeast Florida is a corporation organized under the laws of the State of Delaware. The corporation is authorized to issue a total of 250 shares of voting common stock and 750 shares of non-voting common stock.

3. The shareholders of Northeast Florida and their respective shares, equity interests and voting percentages are as follows:

<u>Name</u>	<u>Shares</u>	<u>Equity Interest</u>	<u>Voting Percentage</u>
Lillian Holt	250 (voting)	25%	100%
Dorothy Wade	750 (non-voting)	75%	0%

4. Neither Northeast Florida nor Ms. Lillian Holt, its voting shareholder, holds any ownership interest in or control of any medium of mass communications in Baldwin, Florida or elsewhere. Ms. Wade does hold a 75% equity interest in HBA Broadcasting, an applicant for a new FM radio station in Martinez, Georgia (File No. BPH-900125MT). However, because Ms. Wade is a non-voting shareholder in Northeast Florida, her interest in HBA Broadcasting is not attributable to Northeast Florida.

5. Northeast Florida proposes to integrate its voting shareholder, Ms. Holt, into the management of the proposed station as its General Manager on a full-time basis (i.e., a minimum of 40 hours per week). As General Manager, Ms. Holt will be responsible for the day-to-day management and supervision of the station and its personnel, and will have ultimate responsibility for all decisions. In addition, Ms. Holt will also have responsibility for supervising the station's hiring practices and for the implementation of the station's Equal Employment Opportunity Program. If Northeast Florida is successful in obtaining the construction permit, Ms. Holt will resign from her then current employment to assume her duties as General Manager of the facility upon the grant of program test authority.

6. Ms. Holt has resided in Jacksonville, Florida within the 3.16 mV/m contour of the proposed facility since February, 1985 and will claim credit for local residence. While a resident of Jacksonville, Ms. Holt has been active in local and civic activities for which Northeast Florida will claim civic involvement credit. These activities are listed in the attached Exhibit A.

Respectfully Submitted,

NORTHEAST FLORIDA BROADCASTING CORP.

By: 

Lillian Holt  
President

By: 

James L. Winston  
Desmond P. Brown  
RUBIN, WINSTON, DIERCKS & HARRIS  
1730 M Street, N.W.  
Suite 412  
Washington, D.C. 210036  
(202) 861-0870

Its Attorneys

Dated: May 8, 1991

**EXHIBIT A**

Northeast Florida will claim civic involvement credit for Lillian Holt's participation in the following activities:

1986-1988	UNCF Duval County Telethon Campaign
1988	Mayor's Educational Council
1989	"We Care Festival" at Edward Waters College
1989	Arts Assembly of Jacksonville, Board of Directors, Member Arts and Education Committee and Cultural Diversity Committee.
1988-1989	Ashland House, Volunteered proposal drafting help.
1988-1989	Help Center, volunteered proposal drafting help.
1989	Duval County School Board, Middle School Coordinating Committee
1989	Mayor's Resource Development Task Force, Jacksonville.
1989	National Urban League AIDS Advisory Committee for South Eastern Region; AIDS Literature Review Committee
1989	Jacksonville Urban League, Minority AIDS Coalition
1989	Jacksonville Chamber of Commerce, Community Affairs Department, Board of Directors
1989	Planning Committee, Florida Black on Black Crime Annual Conference
1989	National Urban League AIDS Advisory Committee for South Eastern Region; AIDS Literature Review Committee
1989	Jacksonville Urban League, Minority AIDS Coalition
1989	Jacksonville Chamber of Commerce, Community Affairs Department, Board of Directors
1989	Planning Committee, Florida Black on Black Crime Annual Conference

CERTIFICATE OF SERVICE

I, Kathy Nickens, a secretary in the law firm of Rubin, Winston, Diercks & Harris, hereby certify that a copy of the attached **INTEGRATION AND DIVERSIFICATION STATEMENT** was served this 10th day of May 1991, to the following persons by first class mail, postage prepaid:

Honorable Edward Luton  
Administrative Law Judge  
Federal Communications  
Commission  
2000 L Street, N.W.  
Room 225  
Washington, D.C. 20554

Mr. Charles E. Dziedzic  
Chief, Hearing Branch  
Federal Communications  
Commission  
Mass Media Bureau  
2025 M Street, N.W.,  
Room 7212  
Washington, D.C. 20554

Chief, Data Management Staff  
Federal Communications  
Commission  
Mass Media Bureau  
Audio Services Division  
1919 M Street, N.W.,  
Room 350  
Washington, D.C. 20554

Denise B. Moline, Esq.  
McCabe & Allen  
9105 Owens Drive  
P.O. Box 2126  
Manassas Park, Virginia 22111  
Counsel for White Broadcasting  
Partnership

David Honig, Esq.  
1800 N.W. 187th Street  
Miami, Florida 33056  
Counsel for Peaches  
Broadcasting, Ltd.

Allan G. Moskowitz, Esq.  
Kaye, Scholer, Fierman,  
Hays & Handler  
901 15th Street, N.W.  
Suite 1100  
Washington, D.C. 20005  
Counsel for Sage Broadcasting  
Corporation

Dennis J. Kelly, Esq.  
Cordon and Kelly  
Second Floor  
1920 N Street, N.W.  
Washington, D.C. 20036  
Counsel for First Coast  
Broadcasting Company

Arthur V. Belendiuk, Esq.  
Smithwick & Belendiuk, P.C.  
2033 M Street, N.W.  
Suite 207  
Washington, D.C. 20036  
Counsel for Douglas Johnson

Salvador A. Serrano  
7205 Enterprise Avenue  
McLean, Virginia 22101  
Counsel for JEM Productions,  
Limited Partnership

Federal Aviation Administration  
Office of Chief Counsel  
AGC-230  
800 Independence Avenue, S.W.  
Washington, D.C. 20591

  
Kathy Nickens

**EXHIBIT 8**



STRUCTURE OF APPLICANT

1. My name is Lillian Holt.

2. I am the president of Northeast Florida Broadcasting Corp. ("Northeast Florida"). Northeast Florida is an applicant for a construction permit to build a new FM radio station on Channel 289A at Baldwin, Florida.

A. Ownership Structure

3. Northeast Florida is a corporation organized under the laws of the State of Delaware. The corporation is authorized to issue a total of 250 shares of voting common stock and 750 shares of non-voting common stock. The ownership structure of Northeast Florida is outlined below:

<u>Name</u>	<u>Shares</u>	<u>Equity Interest</u>	<u>Voting Percentage</u>
Lillian Holt	250 (voting)	25%	100%
Dorothy Wade	750 (non-voting)	75%	0%

4. Lillian Holt, as the only director and voting shareholder in Northeast Florida, has the full authority and power to carry on the business of the corporation, including the execution of all contracts and other documents on behalf of and in the name of the corporation.

5. ~~Dorothy Wade, the only non-voting shareholder in Northeast Florida, is insulated from the management and control of the~~

~~Corporation and the proposed facility.~~ Paragraph 15 of Northeast  
Florida's By-Laws states that,

[t]he holders of Non-Voting Common Stock shall be passive investors and shall not participate in the management or control of the Corporation, engage in any activity which creates the potential for control of the Corporation, transact any business on behalf of the Corporation, or have any power to act for or bind the Corporation. Without limiting the generality of the foregoing, the holders of Non-Voting Common Stock shall not:

- (a) act as an employee of the Corporation;
- (b) serve in any material capacity as an independent contractor or agent of or for the Corporation;
- (c) provide any services to the Corporation;
- (d) communicate with any stockholder of Voting Common Stock or any employees of the Corporation concerning the day-to-day operations of the Corporation;
- (e) serve on an audit committee or committee performing the functions of an audit committee for the Corporation; or
- (f) become in any way involved in the programming or operation of the facility proposed within the Corporation's application for a new FM station at Baldwin, Florida.

**D. Integration of Ownership and Management**

6. Lillian Holt, the voting shareholder of Northeast Florida, will be fully integrated into the ownership and management of the proposed facility. Ms. Holt will be the full-time (i.e., a minimum of 40 hours per week) General Manager of the proposed station.

**C. Local Residence**

7. Ms. Holt has resided in Jacksonville, Florida within the 1 mV/m contour of the proposed facility since February, 1985. If Northeast Florida is awarded the construction permit, she has pledged to continue residing in Jacksonville, Florida.

**D. Local & Civic Activities**

8. Ms. Holt is an active participant in various local and civic activities that serve Baldwin, Florida and the communities within the service area of the proposed station.

**E. Diversification**

9. Neither Northeast Florida nor Ms. Holt, its voting shareholder, has any ownership interest in or control of any medium of mass communication in Baldwin, Florida or elsewhere.

10. Ms. Dorothy Wade, the voting shareholder in Northeast Florida, does hold other media interests outside Baldwin, Florida. She holds a 75% non-voting equity interest in HBA Broadcasting, an applicant for a new FM radio station in Martinez, Georgia (File No. BPH-900125MT).

11. Because Ms. Wade is a non-voting shareholder in Northeast Florida and is insulated from the control and management of the corporation, her media holdings, even if attributable to Ms. Wade, are not attributable to Northeast Florida.

OK

**F. Emergency Auxiliary Power**

12. Northeast Florida will acquire, install and operate an auxiliary power source for the emergency operation of the station. If the studio is not located at the transmitter site, a separate auxiliary power source will be installed at each location.

DECLARATION

I, Lillian Holt, hereby declare as follows:

1. I am the president of Northeast Florida Broadcasting Corp.
2. The foregoing Exhibit No. 1 was prepared for me under my supervision.
3. I have reviewed the foregoing exhibit and to the best of my knowledge, information and belief, the facts stated therein are true and correct.
4. I declare under penalty of perjury that the foregoing is true and correct.

  
Lillian Holt

Executed: July 19, 1991

**EXHIBIT 9**

LILLIAN HOLT

1. My name is Lillian Holt. I am the president of Northeast Florida Broadcasting Corp. ("Northeast Florida"). I have a 25% equity interest in Northeast Florida.

A. Integration Proposal

2. I will serve as the General Manager of the proposed station. As the General Manager, I will be responsible for the day-to-day management and supervision of the station and its personnel, and I will have the ultimate responsibility for all decisions. I will also have responsibility for supervising the station's hiring practices and for the implementation of the station's Equal Employment Opportunity Program. I will devote my full-time (i.e., a minimum of 40 hours per week) to my duties at the station. Should Northeast Florida be awarded the construction permit, upon the grant of program test authority I will resign from any then current employment in order to assume my duties as the General Manager of the facility.

B. Local Residence

3. Between February, 1985 and September 1990, I resided within the 1.0 mV/m contour of Northeast Florida's proposed facility. Between February, 1985 and February, 1990, I resided at 7235 Sharbeth Drive South. After February 1990, I moved to 3716

Bramble Road, where I lived until September, 1990. I now reside at 2567 College Street in Jacksonville, Florida. My current residence may be outside the projected 1 mV/m contour of the station. A map plotting the location of my residences with respect to the projected signal contours of the proposed station will be attached hereto as Attachment 1 at the time this Exhibit is offered at the hearing. If Northeast Florida is awarded the construction permit, I will relocate to a residence that is within the 1 mV/m contour of the proposed facility.

*Claimed  
3.16'*

C. Local and Civic Activities

4. I have been an active participant in various local and civic activities that serve Baldwin and the communities which are within the service area of Northeast Florida's proposed station. These activities are described below:

1986-1988	UNCF Duval County Telethon Campaign.
1988	Mayor's Educational Council.
1987	"We Care Festival" at Edward Waters College.
1989	Arts Assembly of Jacksonville, Board of Directors, Member Arts and Education Committee and Cultural Diversity Committee. ✓
1988-1989	Asland House, Volunteered proposal drafting help. ✓
1988-1989	Help Center, volunteered proposal drafting help. ✓
1989	Duval County School Board, Middle School Coordinating Committee.



1989	Mayor's Resource Development Task Force, Jacksonville.
1989	National Urban League AIDS Advisory Committee for South Eastern Region; AIDS Literature Review Committee.
1989	Jacksonville Urban League, Minority AIDS Coalition.
1989	Jacksonville Chamber of Commerce, Community Affairs Department, Board of Directors.
1989	Planning Committee, Florida Black on Black Crime Annual Conference.

D. Diversification

5. I have no ownership interest in or control of any medium of mass communication in Baldwin, Florida or elsewhere.

E. Minority and Female Status

6. I am an African-American female.